

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

RANDALL E. MEYER,
[DOB: 02/28/1956]

Defendant.

Case No. 16-00159-01-CR-W-DGK

**Count One: *False Statements Related to
Health Care Matters***

18 U.S.C. §§ 1035(a)(2) and 2

NMT: 5 Years Imprisonment

NMT: \$250,000 Fine

NMT: 3 Years Supervised Release

Order of Restitution

Class D Felony

Allegation of Forfeiture

18 U.S.C. § 982(a)(7)

\$100 Mandatory Special Assessment Each
Count

INFORMATION

COUNT ONE – FALSE STATEMENTS RELATED TO HEALTH CARE MATTERS
(18 U.S.C. §§ 1035(a)(2) and 2)

From on or about January 1, 2010 through December 31, 2010, in the Western District of Missouri, defendant RANDALL E. MEYER, in a matter involving health care benefit programs, knowingly and willfully made and caused to be made materially false, fictitious, and fraudulent statements, entries, and representations in connection with the delivery of and payment for health care benefits, items, services in that RANDALL E. MEYER caused statements, entries, and representations to be made in the medical records of the patients listed below stating that the patient's lesion and stenosis in his or her artery was 70% or greater when, in fact, the lesion and stenosis in the patient's artery was actually substantially less than the amount reflected in the medical records.

1. RANDALL E. MEYER was a licensed physician and surgeon and a partner at Central Missouri Cardiology, P.C., a cardiology practice group in Jefferson City, Missouri.

2. During the time period of January 1, 2010 through December 31, 2010, in the Western District of Missouri, RANDALL E. MEYER performed medical services and treatments at, among other places, Capital Region Medical Center and St. Mary's Health Center, both located in Jefferson City, Missouri.

3. Stenosis is an abnormal narrowing in a blood vessel.

4. A stent is a tube or other device placed in the body to create a passage between two hollow spaces and/or widen a narrow blood vessel.

5. Coronary stents are placed during percutaneous coronary intervention (PCI), also known as an angioplasty. The most common use for coronary stents is in the coronary arteries, into which a bare-metal stent or drug-eluting stent is inserted.

6. When a patient is determined to have stenosis to a degree that justifies intervention, and is undergoing a PCI, a physician must accurately document and maintain in the medical record his or her findings for the need to treat the patient, and any intervention and subsequent treatment.

7. During the time period of January 1, 2010 through December 31, 2010, RANDALL E. MEYER treated the patients listed below, and stated that the percentage of the patient's lesion and stenosis in his or her artery was 70% or greater when, in fact, it was substantially less. RANDALL E. MEYER used his misstatement of the significance of the lesion and stenosis to ensure the claims would be paid, and then submitted, or caused to be submitted, claims for payment for treatments or services to health care benefit programs, as defined by federal law.

8. For the claims at issue here, the health care benefit programs would not have allowed, reimbursed, or paid those claims if the programs had known that

RANDALL E. MEYER was inflating the percentage of patient lesion and stenosis to be 70% or greater, when it was in fact substantially less.

9. The information in the table below relates to claims, during the time period of January 1, 2010 through December 31, 2010, that RANDALL E. MEYER fraudulently submitted, or caused to be submitted, to health care benefit programs:

Patient	Date of PCI
H.B.	01/06/2010
W.C.	10/15/2010
B.D.	04/15/2010
D.G.	08/26/2010
J.L.	10/21/2010
P.L.	09/11/2010
B.M.	09/02/2010
D.P.	08/05/2010
M.R.	12/01/2010
M.K.S.	10/14/2010
M.M.S.	11/03/2010
D.T.	09/16/2010
P.T.	12/03/2010
J.W.	08/12/2010

10. When the health care benefit programs made payments on the claims referenced in the table above, RANDALL E. MEYER and others, including Central Missouri Cardiology, P.C.; Capital Region Medical Center; and St. Mary's Health Center financially benefited.

All in violation of Title 18, United States Code, Section 1035(a)(2) and 2.

ALLEGATION OF FORFEITURE

11. The allegations contained in Count One of this Information are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982(a)(7).

12. Upon conviction of the offense in violation of Title 18, United States Code, Section 1035(a)(2) set forth in Count One of this Information, the defendant RANDALL E. MEYER, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(7), any property, real or personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of the offense. The property to be forfeited includes, but is not limited to, the following: U.S. Currency in the amount of at least \$76,369.08.

If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

Respectfully submitted,

Tammy Dickinson
United States Attorney

By */s/ Gregg R. Coonrod*

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Dated: May 13, 2016